

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**RECOVERY LIMITED PARTNERSHIP,
Plaintiff,**

v.

Civil Action No.: 2:87-cv-00363

**UNIDENTIFIED, WRECKED AND ABANDONED
SAILING VESSEL, etc.,
Defendant.**

MOTION TO FILE UNDER SEAL

Recovery Limited Partnership (the “Plaintiff” or “RLP”), by counsel, at the direction of the Court, and pursuant to local rules, moves this Court for entry of an Order filing under seal Exhibits 1 – 3 to the accompanying Memorandum in Support. Exhibit 1 is the Plaintiff’s Confidential Status Report. Exhibit 2 is the Declaration of John B. Pidcock. Exhibit 3 is the Declaration of Craig T. Mullen. The reasons for filing these documents under seal are stated in the accompanying Memorandum in Support.

Accordingly, RLP moves for the entry of a sealing order to file under seal Exhibits 1 – 3 to the accompanying Memorandum in Support of Motion to File under Seal, with these documents remaining sealed until the entry of a final order in this matter, then returned to the filing party. A proposed order is attached to this Motion.

This 30th day of May, 2025.

/s/ K. Barrett Luxhoj

James L. Chapman, IV, Esquire (VS. No. 21983)

K. Barrett Luxhoj, Esquire (VS. No. 86302)

Counsel for Recovery Limited Partnership

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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of May, 2025, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered filers.

/s/ K. Barrett Luxhoj

James L. Chapman, IV, Esquire (VS. No. 21983)

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